

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (BRL)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

JO ANN CRUPI, *et al.*,

Defendants.

Adv. Pro. No. 10-04216 (BRL)

STIPULATION AND ORDER FOR EXTENSION OF TIME TO RESPOND

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which Defendant NTC & Co. LLP may move, answer or otherwise respond to the Complaint is extended up to and including April 15, 2011. The pre-trial conference that was previously scheduled for April 27, 2011 is adjourned and will now be held on December 29, 2011 at 10:00 a.m.

The purpose of this stipulated extension is to provide additional time for Defendants to answer, move against, or otherwise respond to the Complaint. This is the fourth such extension.

Nothing in this stipulation is a waiver of the Defendant's right to request from the Court a further extension of time to answer, move or otherwise respond and/or the Trustee's right to object to any such request.

The parties to this stipulation reserve all rights and defenses they may have, and entry into this stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this stipulation shall be deemed an original.

Dated: March 14, 2011

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Attorneys for Defendant NTC & Co LLP

SO ORDERED

Dated: March 15, 2011
New York, New York

/s/Burton R. Lifland
HON. BURTON LIFLAND
UNITED STATES BANKRUPTCY JUDGE